

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**ROSEMARIE NEAL, RANDY  
SAMMONS, JOSEPH TRUJEQUE,  
JOHN ARAGON, GUADALUPE  
AVILA, MANUEL BECERRA, MISTI  
CARMICHAEL, DOMINIC CASAUS,  
LEONARDO FLORES, OSCAR  
GARCIA, CRAIG HOGAN, PLACIDO  
MALDONADO, TIM MORA, DEBBIE  
PADILLA, MICHAEL PALM, JASON  
PUPURA, RENE SWANBERG,  
CHRISTOPHER TORRES, CYNTHIA  
TRUJILLO, CARLOS YGUADO,  
FERNANDO YGUADO, MONICA  
REYES, MARIO RODRIGUEZ,  
ROBERT SANCHEZ, LARRAINE  
LUNA, ENOCK ARVIZO, ANTHONY  
CANDELARIA, MARVIN MARTINEZ,  
ANGEL MONTOYA, TANYA  
SANCHEZ, ERICA GUTIERREZ and  
LIZ AGUILAR on their own behalf and  
on behalf of all others similarly situated,**

**29 U.S.C. § 216(b) Collective Action**

**Plaintiffs,**

**vs.**

**No. 08-CV-1010 JEC-GBW**

**THE BOARD OF COUNTY  
COMMISSIONERS OF BERNALILLO  
COUNTY.**

**Defendant.**

**PROPOSED SPECIAL MASTER'S ORDER REGARDING DISCOVERY**

Based on the parties' mutual consent, the Special Master in the above-captioned  
action HEREBY ORDERS THAT:

1. Defendant shall produce the following documents and things by March 19, 2010 as they relate to each of the 5 agreed-upon representative Plaintiffs<sup>1</sup> in this action:
  - a. All text and phone records;
  - b. BI Summaries with comments for all inmates on each representative Plaintiff's caseload;
  - c. BI GPS Summaries with comments for all inmates on each representative Plaintiff's caseload;
  - d. Case notes for each Plaintiff's entire caseload;
  - e. MDC-6 forms relating in any way to each representative Plaintiff;
  - f. Dispatch logs relating in any way to each representative Plaintiff;
  - g. Timesheets and pay records (Empath and Telestaff) for each representative Plaintiff.
2. The parties agree that these documents will be produced for the July – September 2008 time period.
3. The parties agree that the July-September 2008 time period is representative of the entire statutory liability period at issue in this litigation and expressly waive the right to raise any argument or evidence contrary to the representativeness of this time period for the purposes of either liability or damages in this case.

Dated March 15, 2010

  
Special Master Michael Harbour

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<sup>1</sup> The parties have agreed that Plaintiffs Joseph Trujeque, Rosemarie Neal, Randy Sammons, Jason Purpura and Rene Swanberg will represent the class of Plaintiffs in this action.